

## ***Innovatus Technology Pty Ltd – Australian Privacy Policy***

Innovatus Technology Pty Ltd in Australia and New Zealand ("Innovatus", "us", "we", "our") recognise the importance of your privacy and understand that the security of your personal information is important to you. We are committed to protecting the personal information you provide to us or that we otherwise hold about you.

This privacy policy ("Policy") outlines how we manage your personal information and protect your privacy. We are bound by the Australian Privacy Principles contained in the *Australian Privacy Act 1988* (Cth) and the New Zealand Privacy Principles contained in the *Privacy Act 2020* (NZ) ("the Principles") and ("the Privacy Acts") as applicable. In New Zealand, to the extent that personal information is health information, Innovatus is also bound by the New Zealand Health Information Privacy Code 1994 ("Health Code").

By providing us with your personal information, you consent to our collection, use and disclosure of your personal information in accordance with this Policy and any other arrangements that apply between us. From time to time it may be necessary for Innovatus to review and revise this, Policy. Innovatus encourages you to periodically check our website to ensure you are aware of the most up-to-date version of this Policy.

Personal information includes information or an opinion about an identified individual or an individual who is reasonably identifiable (such as names or email addresses). Unless indicated otherwise, references to personal information also include sensitive information, such as information or an opinion about your health, or health services provided to you.

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### **What personal information does Innovatus collect?**

We only collect personal information for purposes which are directly related to our services, functions or activities and only when necessary for, or directly related to those purposes. If you do not provide your personal information, we may not be able to provide some or all of our services or products to you or contact you in order to perform the functions and activities set out in this Policy.

*Who does Innovatus collect personal information about?*

Innovatus may collect personal information about the following individuals:

- healthcare professionals (including doctors, optometrists);
- members of the public (in their interactions with Innovatus);
- third parties who provide a service or product to Innovatus; and
- prospective employees and contractors.

*Types of personal information collected*

The personal information Innovatus collects about you may include (without limitation):

- **ID information:**
  - identifying information such as your name, age or date of birth and gender;
  - contact information such as your address, employment details, email address and mobile phone number; and
  - educational and professional membership information;
- financial information such as bank account details, if required for payments;

- information provided in connection with assessing, recording and reporting adverse events related to our products;
- **information required by law:**
  - if you are a healthcare professional, information necessary to provide product recalls and product safety notifications; and
  - information required to be collected by Australian Federal, State and Territory or New Zealand law, including in relation to adverse event reports and safety issues under the *Therapeutic Goods Act 1989* (Cth), and records of sample medicines provided to healthcare professionals under the Medicines Australia Code of Conduct or the Medicines New Zealand Code of Practice;
- **enquiry or attendance information:**
  - if you are a healthcare professional, information about your attendance at programs organised or supported by Innovatus (including meetings, conferences, expert panels, clinical trials and research or disease awareness programs) (**AZ Programs**);
  - information about your attendance at educational or disease awareness events;
  - if you are a healthcare professional, your interactions with sales representatives;
  - information you provide through surveys or that you provide to us directly or indirectly through the website or to our representatives;
  - details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those services and respond to your enquiries; and
  - details in relation to complaints that you have made; and
- any other personal information that may be required in order to facilitate your interaction with us.

### *Anonymity*

Where possible, we will allow you to interact with us anonymously (for example, when you contact our enquiries line with a general question). However for the majority of our functions, we usually require your name and contact information and enough information to allow us to efficiently handle our interaction with you.

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### **How does Innovatus collect personal information?**

We may collect these types of personal information either directly from you, if you are a patient from your healthcare professional, or from third parties. We may collect this information:

- directly from you, including when:
  - you communicate with us over the telephone, in person, through a form or online portal or by email;
  - you make an inquiry, complaint or report an actual or suspected adverse event or you attend an AZ Program;
  - you use our information services, such as the Medical Information phone line;
- from organisations engaged by Innovatus to carry out functions on our behalf including:
  - administrators of patient support or supply programs;

- event management organisations, in respect of AZ Programs; and
- recruitment agencies, in respect of prospective employees;
- in respect of patients (including information in connection with actual or suspected adverse events), from your healthcare professionals; and
- in respect of healthcare professionals, from online directories which we subscribe to.

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### **Why does Innovatus collect, hold, use and disclose personal information?**

We may collect, hold, use and disclose your personal information for the following purposes:

- as indicated to you at the time we collected your personal information;
- to provide educational or health products or services (including advice or product medical information) that you or your healthcare professional have requested;
- to assess, record and report actual or suspected adverse events and safety issues, including (if applicable) to seek additional information in connection with such adverse events or safety issues;
- **Patient Programs**
  - to manage patient support programs and patient supply programs that are administered via third parties or Innovatus; and
  - to identify investigators for, establish and conduct clinical trials (including clinical trials run by a related body corporate of Innovatus);
- **AZ Programs**
  - to provide and invite you to attend educational events and conferences and disease management programs, including any associated logistics; and
  - to invite you to provide services to Innovatus, including speaking engagements, participation on advisory boards/steering committees, or to provide general opinions on medical and/or patient related issues and the development of materials;
  - if you would prefer to not receive promotional or other material from us, please let us know and we will respect your request. You can unsubscribe from such communications at any time you choose.
- **General business**
  - to maintain a record of enquiries and complaints in relation to Innovatus products and services;
  - to assist us in responding to, and following up on, your queries and providing you with information, including where you provide us with personal or sensitive information through our Medical Information line;
  - for general sales, marketing and medical activities, including to contact you to provide you with information about, and discuss, Innovatus products (in accordance with the Marketing section below);
  - to conduct market research;
  - to process, monitor and screen any fees payable, or expenses reimbursable, by Innovatus to you; and
  - to consider employment applications and recruit Innovatus personnel; and

- **As required or authorised by law**
  - to comply with legal or regulatory obligations or transparency requirements including those that apply to Innovatus activities globally; and
  - for other purposes required or authorised by or under law, including purposes for which you have provided your express or implied consent.

We may use or disclose information about you in order to combine the information that we hold about you with information about you collected from or held by other trusted partners or from public sources. We do this so that we can serve you better and can improve our services.

We may use de-identified, aggregated data derived from your personal information for internal purposes, such as improving the functionality of our website or services. We may also use such de-identified, aggregated information for analytical purposes, such as to develop analytical insights about the use our website and services (including monitoring website traffic) and participation in patient programs administered by us or third parties.

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### **To whom does Innovatus disclose your personal information?**

Innovatus may disclose your personal information to third parties, including parties which are located overseas, such as:

- our affiliates and related bodies corporate, including those located overseas.
- regulatory authorities and ethics committees as part of a clinical trial evaluation, monitoring or inspection process, including but not limited to the Therapeutic Goods Administration in Australia and the Food & Drug Administration in the US;
- third party suppliers and service providers to assist Innovatus in carrying out the purposes set out in this Policy located globally including in the US, European Union and Asia Pacific such as healthcare professionals, clinical research organisations, patient support program administrators, our finance processing provider (located in Malaysia) travel agents, market researchers, professional conference or event management organisations, IT support providers, mail houses, recruitment agencies and professional advisors;
- parties involved in a prospective or actual transfer of our assets or business; and
- other persons, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

We will take reasonable steps to ensure that any overseas recipient will deal with your personal information in a way that is consistent with the Principles and this Policy. Generally, we require that organisations outside Innovatus who handle or obtain personal information as service providers to Innovatus acknowledge the confidentiality of this information, undertake to respect an individual's right to privacy and comply with Innovatus global commitment to privacy.

The collection and use of your information by these third parties may also be subject to separate privacy and security policies.

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### **Marketing**

Innovatus may use your personal information to contact you (including by telephone, text message or email) in relation to Innovatus products or services we think may be of interest to you. Innovatus will not send you a commercial electronic message unless permitted by the *Spam Act 2003* (Cth) or the *Unsolicited Electronic Messages Act 2007* (NZ).

We will only use or disclose your sensitive information for the purpose of direct marketing with your consent.

You may opt-out of receiving marketing information from Innovatus at any time by contacting the Chief Compliance Officer using the details below or by using the opt-out facilities provided within the relevant marketing material.

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### **Sensitive information**

As mentioned previously, some personal information, which includes all health information collected by Innovatus is considered “sensitive”. Due to the nature of our business, we may sometimes need to collect sensitive information about you.

We will collect your sensitive information in accordance with the Principles and only where provided by you or your healthcare professional, with your consent and where necessary for or directly related to our services (including support services), functions or activities, such as:

- information about your health, including your health status or medical conditions, when you call our Medical Information line;
- information about your health, genetic or biometric information, health services being provided to you or your medical history, if we are providing you with a product or you are involved in a patient program;
- information about your health, including previous medical and medication history, and side effects, if you have, or are suspected to have, suffered an adverse event in relation to one of our products; or
- information about your professional association memberships, if such information is required for our dealings with you.

We only use and disclose sensitive information for the purposes for which it was provided, or a directly related purpose you would reasonably expect (such as following up in relation to Medical Information line queries or adverse event reports), unless you provide your consent or where required or authorised by or under law such as if the use or disclosure of sensitive information is required to prevent a serious and imminent threat to the life or health of an individual.

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### **Cookies**

Innovatus may collect personal information about you when you use or access our website, through the use of 'cookies'. A cookie is a small file that stores information on your computer, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You have the ability to accept or decline cookies and can choose to disable cookies through your internet browser. If you choose to decline cookies, some areas of Innovatus or other websites may not function properly.

Innovatus may use cookies to compile statistics that allow us to understand how a website is used and to facilitate your visit to a website (including remembering your preferences). We will handle any personal information collected by cookies in the same way that we handle all other personal information as described in this Policy.

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### **Management and security of personal information**

Innovatus stores your personal information in hard copy documents or as electronic data in our software IT systems (and those of our service providers).

Innovatus is committed to keeping your personal and sensitive information secure and has appointed a Chief Compliance Officer to oversee Innovatus management of personal information in accordance with this Policy and the respective Privacy Acts.

We take reasonable steps to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. For example, Innovatus has directed its staff that personal information must be dealt with in accordance with this Policy and kept secure (using a variety of security technologies and procedures) from unauthorised access or disclosure.

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### **Accessing or correcting personal information Innovatus holds about you**

You can access the personal information Innovatus holds about you, by contacting the Chief Compliance Officer using the details below. Sometimes, we may not be able to provide you with access to some or all of your personal information and, where this is the case, we will tell you why. Innovatus will deal with requests for access to personal information as quickly as possible and will endeavour to respond within 14 days of receipt of the request in writing.

Innovatus endeavours to ensure that the personal information it holds about you is accurate, complete and up-to-date. If you think that any personal information, we hold about you is inaccurate, please contact the Chief Compliance Officer and we will take reasonable steps to ensure that it is corrected.

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### **What if you have a complaint?**

If you have any concerns or complaints about the manner in which your personal information has been collected or handled by Innovatus, please contact the Chief Compliance Officer. Your concern or complaint will be directed to the appropriate complaint manager who will consider and endeavour to respond to your complaint within 14 days.

It is our intention to use our best endeavours to resolve any complaint to your satisfaction. However, if you are unhappy with our response:

- In Australia you may contact the Office of the Australian Information Commissioner who may investigate your complaint further. Further information about the application of the Australian Privacy Act can be found at [www.oaic.gov.au](http://www.oaic.gov.au).
- In New Zealand you may contact the New Zealand Privacy Commissioner who may investigate your complaint further. Further information about the application of the New Zealand Privacy Act can be found at [www.privacy.org.nz](http://www.privacy.org.nz).

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### **How to contact us**

If you have questions about our Policy or privacy practices, wish to provide feedback about this Policy or would like to access or correct your personal information held by Innovatus, please contact our Chief Compliance Officer at:

**Email:** [arjun@eye.space](mailto:arjun@eye.space)

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### **Changes**

We may change this Privacy Policy. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on this page. Your use of the EyeSpace website following these

changes means that you accept the revised Privacy Policy. We recommend that you regularly review the Privacy Policy when you visit the EyeSpace website. This policy was last updated in January 2023